

Mark C. Mao, CA Bar No. 236165  
 Beko Reblitz-Richardson, CA Bar No. 238027  
**BOIES SCHILLER FLEXNER LLP**  
 44 Montgomery St., 41st Floor  
 San Francisco, CA 94104  
 Tel.: (415) 293-6800  
 mmao@bsflp.com  
 brichardson@bsflp.com

Jesse Panuccio (admitted *pro hac vice*)  
**BOIES SCHILLER FLEXNER LLP**  
 1401 New York Ave, NW  
 Washington, DC 20005  
 Tel.: (202) 237-2727  
 Fax: (202) 237-6131  
 jpanuccio@bsflp.com

Amanda K. Bonn, CA Bar No. 270891  
**SUSMAN GODFREY L.L.P.**  
 1900 Avenue of the Stars, Suite 1400  
 Los Angeles, CA 90067  
 Tel: (310) 789-3100  
 Fax: (310) 789-3150  
 abonn@susmangodfrey.com

*Attorneys for Plaintiffs*

William Christopher Carmody  
 (admitted *pro hac vice*)  
 Shawn J. Rabin (admitted *pro hac vice*)  
 Steven M. Shepard (admitted *pro hac vice*)  
 Alexander P. Frawley  
 (admitted *pro hac vice*)  
**SUSMAN GODFREY L.L.P.**  
 1301 Avenue of the Americas,  
 32<sup>nd</sup> Floor  
 New York, NY 10019  
 Tel.: (212) 336-8330  
 bcarmody@susmangodfrey.com  
 srabin@susmangodfrey.com  
 sshepard@susmangodfrey.com  
 afrawley@susmangodfrey.com

John A. Yanchunis (admitted *pro hac vice*)  
 Ryan J. McGee (admitted *pro hac vice*)  
 Michael F. Ram (admitted *pro hac vice*)  
 Ra O. Amen (admitted *pro hac vice*)  
**MORGAN & MORGAN**  
 201 N. Franklin Street, 7th Floor  
 Tampa, FL 33602  
 Tel.: (813) 223-5505  
 jyanchunis@forthepeople.com  
 rmcgee@forthepeople.com  
 mram@forthepeople.com  
 ramen@forthepeople.com

**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
 MUNIZ, ELIZA CAMBAY, SAL  
 CATALDO, EMIR GOENAGA, JULIAN  
 SANTIAGO, HAROLD NYANJOM,  
 KELLIE NYANJOM, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**DECLARATION OF MARK C. MAO IN  
 SUPPORT OF PLAINTIFFS' MOTION  
 FOR LEAVE TO FILE SURREPLY IN  
 OPPOSITION TO GOOGLE'S MOTION  
 TO DISMISS THE THIRD AMENDED  
 COMPLAINT, AND REQUEST FOR  
 ORAL ARGUMENT**

The Honorable Richard Seeborg  
 Courtroom 3 – 17th Floor  
 Date: October 28, 2021  
 Time: 1:30 p.m.

**DECLARATION OF MARK C. MAO**

I, Mark C. Mao, declare as follows.

1. I am a partner with the law firm of Boies Schiller Flexner LLP, counsel for Plaintiffs in this matter. I am an attorney at law duly licensed to practice before all courts of the State of California. I have personal knowledge of the matters set forth herein and am competent to testify.

2. Google LLC ("Google") has accused Plaintiffs of litigating in bad faith in their recent motion to dismiss. Taking counsel's threats and representations to the Court seriously, Plaintiffs have diligently investigated their facts and allegations.

3. Therefore, after receiving Google's Motion to Dismiss Plaintiffs' Third Amended Complaint, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed this 18<sup>th</sup> day of October, 2021, at San Francisco, California.

/s/ Mark C. Mao